

FILED**Jun 24 - 2025**

John M. Domurad, Clerk

AO 91 (Rev. 11/11) Criminal Complaint

UNITED STATES DISTRICT COURT

for the

Northern District of New York

UNITED STATES OF AMERICA

v.

APRIL STORM**Defendant.**

Case No. 8:25-MJ-189 (GLF)

CRIMINAL COMPLAINT

I, the complainant in this case, state that the following is true to the best of my knowledge and belief. Between on or about October 29, 2024 and on or about November 10, 2024, in the county of St. Lawrence in the Northern District of New York, the defendant violated:

Code Section
8 U.S.C. § 1324(a)(1)(A)(v)(I)

Offense Description
Conspiracy to Bring Aliens

This criminal complaint is based on these facts:

☒ Continued on the attached sheet.

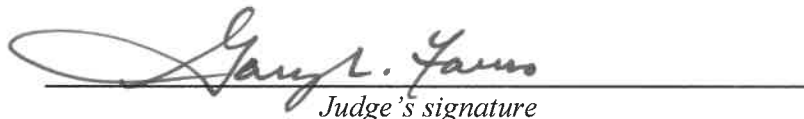

Complainant's signature

HSI Special Agent Thomas Keenan

Printed name and title

Attested to by the affiant in accordance with Rule 4.1 of the Federal Rules of Criminal Procedure.

Date: JUNE 24, 2025


Judge's signature

City and State: Plattsburgh, New York

Hon. Gary L. Favro, U.S. Magistrate Judge

Printed name and title

Continuation Sheet, *United States v. APRIL STORM*

This criminal complaint is based on these facts:

On February 20, 2025, Co-Conspirator 1 stated “April” conspired with him, Co-Conspirator 2, and other co-conspirators to bring aliens into the United States on multiple occasions. Co-Conspirator 1 identified one such event, which occurred sometime between September and November 2024, in which approximately 14 aliens were smuggled into the United States from Canada in Massena, NY. Co-Conspirator 1 stated April STORM was a participant in this specific event, and drove aliens from Massena, NY to another destination in the United States after the aliens were smuggled into the United States from Canada.

On February 24, 2025, Co-Conspirator 2 stated STORM was involved with almost every alien smuggling event he coordinated. All these events involved smuggling aliens from Canada into the United States in the vicinity of Massena, New York. Co-Conspirator 2 admitted to investigators that he was responsible for 12-15 alien smuggling events in Massena, New York.

On April 9, 2025, Co-Conspirator 3 admitted his involvement with alien smuggling as part of Co-Conspirator 2’s smuggling operation. Co-Conspirator 3 stated he was introduced to Co-Conspirator 2 through STORM, and STORM knowingly transported aliens after they were smuggled into the United States on multiple occasions.

During a review of Co-Conspirator 2’s phone, your affiant observed a phone contact for STORM as well as conversations between Co-Conspirator 2 and STORM. The number for April STORM is 518-534-[REDACTED]. A photograph of April STORM is attached to the contact profile in Co-Conspirator 2’s cell phone. Open source database checks indicate to your affiant that April STORM is the user and subscriber of 518-534-[REDACTED].

The text messages between STORM and Co-Conspirator 2 discuss multiple alien smuggling events. For example, during a text exchange on November 6, 2024, STORM and Co-Conspirator 2 placed multiple calls to each other utilizing WhatsApp, an application that allows users to send text, multimedia, voice, and other message types, as well as video and audio phone calls.

On November 6, after multiple phone calls and texts from STORM, Co-Conspirator 2 told her, “Your good do as he says and bring the money back tell him \$1500.” Approximately two hours later, after other voice calls and text message, STORM texted Co-Conspirator 1 “... Had leave motel tell will that they hv to pay pluspay the 1500 cause he not I’m stressed.”

“[W]ill” is known by law enforcement to be William O’Reilly. Your affiant believes this is in reference to payment for the purposes of smuggling aliens from Canada into the United States. Your affiant also knows, based on this investigation and review of other evidence, that multiple alien smuggling events occurred during this time frame in November at the direction of Co-Conspirator 2 and other co-conspirators. Your affiant also knows the aliens almost always paid the “driver” with cash upon their arrival into the United States.